



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

March 5, 2024

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:   *United States v. Robert Menendez, et al.,*  
      S4 23 Cr. 490 (SHS)**

Dear Judge Stein:

The Government respectfully writes to advise the Court that a superseding indictment was returned by the grand jury earlier today and docketed as S4 23 Cr. 490 (SHS) (the "Superseding Indictment," enclosed). The Superseding Indictment includes the same offenses as the S2 indictment as to Robert Menendez, Nadine Menendez, Wael Hana, and Fred Daibes, but also charges corresponding substantive offenses, and includes new charges of conspiracy to obstruct justice and obstruction of justice.

Honorable Sidney H. Stein

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The filing of the Superseding Indictment will not necessitate the production of any additional discovery and, in the Government's view, does not affect the scheduled May 6, 2024 trial date.

Respectfully submitted,

DAMIAN WILLIAMS  
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Enclosure

cc: Counsel of Record (via ECF)